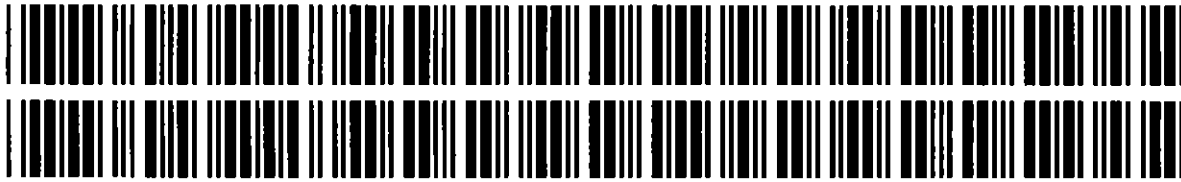


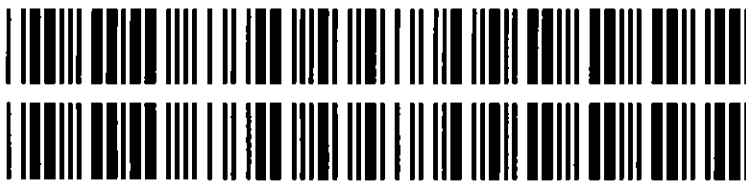
CV-S-00-0410



CV-S-00-0410-0001



03/31/2000



\*A / /



CV-S-00-0410



CV-S-00-0410-0001



03/31/2000



MITCHELL D. GLINER, ESQ.  
Nevada Bar #003419  
3017 West Charleston Boulevard  
Suite 95  
Las Vegas, NV 89102  
(702) 870-8700  
Attorney for Plaintiff

RECEIVED  
MAR 31 11 48 AM '00

LANCE S. WILSON  
CLERK  
U.S. DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHARON KAY DOWNS nee SIMON, CV-S-00-0410-JBR-RJJ

Plaintiff,

vs.

BANK OF AMERICA N.T. & S.A., )  
d/b/a NATIONS BANK, )  
Defendant. )

SIX PERSON JURY DEMANDED

COMPLAINT

JURISDICTION

1. The jurisdiction of this Court attains pursuant to the FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of the Judicial District of Nevada as Plaintiff's claims arose from acts of the Defendant perpetrated therein.

PRELIMINARY STATEMENT

2. The Plaintiff brings this action for damages based upon Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (hereinafter referred to as "FCRA"), and of state law obligations brought as supplemental claims.

4. Defendant Bank of America N.T. & S.A., d/b/a Nations Bank (BOA), is a furnisher of information as contemplated by FCRA § 1681s-2(a) & (b), who regularly and in the ordinary course of business furnishes information to one or more consumer reporting agencies about consumer transactions or experiences with any consumer.

5. Plaintiff's creditworthiness has been repeatedly compromised by the acts, obduracy and general indifference of the Defendant.

6. The debt underlying this action was incurred by Plaintiff's former spouse during or before 1990. Plaintiff was a co-signatory on that account.

7. Plaintiff's former spouse became a drug user and was consequently divorced by Plaintiff. Despite the divorce, Plaintiff's credit was completely undermined by her former spouse's financial irresponsibility.

8. In 1998 Plaintiff set out to restore her credit. A copy of Plaintiff's Equifax Credit Report, dated January 28, 1998, is attached as Exhibit 1. Exhibit 1 reflects a collection account assigned by the Defendant. Plaintiff disputed the account directly with both Equifax and Defendant imparting that the subject account was more than 7 years old.

1           9.    The Defendant's account was deleted as a result of the  
2   dispute. Plaintiff's Equifax Credit Report, dated May 8, 1998, is  
3   attached as Exhibit 2 and reflects the deletion.

4           10. Plaintiff reviewed her credit two years later as a pre-  
5   cursor to applying for new employment. A copy of the relevant  
6   portion of Plaintiff's Equifax Credit Report, dated January 26,  
7   2000, is attached as Exhibit 3.

8           11. Exhibit 3 reflects a rehabilitated credit history but for  
9   the underlying account reassigned to collection with NCO Financial  
10  Services, Inc. (NCO).

11           12. A copy of the relevant portion of the discovery relating  
12  to Plaintiff's FDCPA suit against NCO is attached as Exhibit 4.  
13  Exhibit 4 reflects that the account assigned to NCO was the same  
14  one previously deleted subsequent to dispute with both Equifax and  
15  Defendant.

16           13. A copy of Plaintiff's dispute to Experian, dated March 1,  
17  2000, detailing the compromise of Plaintiff's Experian Report is  
18  attached as Exhibit 5.

19           14. Defendant failed to investigate Plaintiff's dispute in  
20  accordance with FCRA § 1681i. A furnisher of information cannot  
21  simply re-verify. ". . . In a reinvestigation of the accuracy of  
22  credit reports, a [furnisher of information] must bear some  
23  responsibility for evaluating the accuracy of information  
24  obtained . . . ." Stevenson v. TRW, INC., 987 F.2d 288, 293 (5th  
25  Cir. 1993).

26   . . .

27   . . .

28  
LAW OFFICES  
MITCHELL D. GLINER  
3017 W Charleston Blvd  
Suite 95  
Las Vegas, Nevada 89102  
(702) 870 8700

STATEMENT OF CLAIM AS AGAINST DEFENDANT

22. In the entire course of its action, Defendant willfully and/or negligently violated the provisions of the FCRA in the following respects:

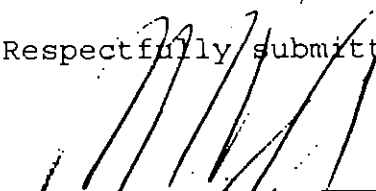
- a. By willfully and/or negligently failing to comport with FCRA § 1681s-2(b).

PRAYER FOR RELIEF

THEREFORE, Plaintiff prays that the court grant the following relief as against Defendant:

- a) actual damages in the amount of \$100,000;  
b) punitive damages in the amount of \$100,000;  
c) attorney's fees; and  
d) costs.

Respectfully submitted,

  
MITCHELL D. GLINER, ESQ.  
Nevada Bar #003419  
3017 West Charleston Boulevard  
Suite 95  
Las Vegas, NV 89102  
Attorney for Plaintiff

LAW OFFICES  
MITCHELL D. GLINER  
3017 W Charleston Blvd  
Suite 95  
Las Vegas, Nevada 89102  
(702) 870-8700

**EXHIBITS**

Please Press all  
corres, .ence to 1. address #

EQUIFAX CREDIT INFORMATION SERVICES  
P O BOX 740286  
ATLANTA, GA 30374  
(800)270-3438

SHARON K SIMON  
618 S B ST  
LAKE WORTH FL 33460

DATE 01/28/98  
SOCIAL SECURITY NUMBER  
DATE OF BIRTH 05/01/46

CREDIT HISTORY											
Company Name	Account Number	When Acct. Opened	Month Reported	Date of Last Activity	High Credit	Time	Balance	Rate	Status	Date Reported	
MIDLAND MORTGAGE		I 07/86	28	12/97	69K	681	60K		I1	12/97	
REAL ESTATE MORTGAGE											
FHA MORTGAGE											
WEST CAPITAL	30(00)60(00)90+(04)	I 05/92	05	07/92	939		939	939	05	12/97	
>>> PRIOR PAYING HISTORY -				11/97-05,09/97-05,08/97-05					<<<		
COLLECTION ACCOUNT											
J C PENNEY	30(01)80(01)90+(02)	I 06/89	10	05/91	257		257	257	R9	12/97	
>>> PRIOR PAYING HISTORY -				10/91-R5,09/91-R4,08/91-R3					<<<		
BANC ONE	30(01)60(00)90+(04)	I 11/87	10	09/91	2400		2871	2K+	R9	08/97	
>>> PRIOR PAYING HISTORY -				09/91-R5,08/91-R5,07/91-R4					<<<		
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
MACY'S CALIFORNIA	30(00)60(00)90+(02)	I 10/84	10	03/98	238		239	239	19	11/98	
>>> PRIOR PAYING HISTORY -				10/98-15,09/98-15					<<<		
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
MACY'S CALIFORNIA	30(00)60(00)90+(01)	I 10/84	10	03/98	854		239	239	R9	11/98	
>>> PRIOR PAYING HISTORY -				10/98-R5					<<<		
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
MACY'S SOUTH	30(00)60(00)90+(01)	I 07/88	01	01/92	0	21	21	21	R9	08/98	
>>> PRIOR PAYING HISTORY -									<<<		
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
BARNETT	30(00)60(00)90+(01)	I 12/88	08	10/94	18K	303	0	0	I1	10/94	
>>> PRIOR PAYING HISTORY -									<<<		
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
AMERICAN EXPRESS	30(00)60(00)90+(01)	I 09/88	04	09/91	3010		3010	3K+	09	11/93	
>>> PRIOR PAYING HISTORY -									<<<		
CHARGED OFF ACCOUNT											
LORD & TAYLOR	30(00)60(00)90+(03)	I 09/87	08	08/91	472		0	0	09	09/93	
>>> PRIOR PAYING HISTORY -				08/91-05,07/91-05,06/91-04					<<<		
CHARGED OFF ACCOUNT											
CHASE NA	30(01)80(01)90+(03)	I 05/88	12	12/91	800	160	950	950	R9	07/92	
>>> PRIOR PAYING HISTORY -				12/91-R5,11/91-R5,10/91-R4					<<<		
CHARGED OFF ACCOUNT											
CLOSED ACCOUNT											
>>> COLLECTION REPORTED 10/94; ASSIGNED 08/94 TO ECC MANAGEMENT SERVI (215)265-8900											
CLIENT-NATIONS BANK CA; AMOUNT-\$2193; UNPAID; BALANCE-\$2193											
DATE OF LAST ACTIVITY 08/94; ACCOUNT NUMBER 842218											
>>> COLLECTION AGENCY TELEPHONE NUMBER(S)											
ECC MANAGEMENT SERVI(215)265-8900											
475 N. HILL AVE. RD.											
149 N. PINE ST., PA 19106											
***** ADDITIONAL INFORMATION *****											
FORMER/OTHER ADDRESS 4415 ROARK, LAS VEGAS, NV. 89124											
LAST REPORTED EMPL - JC PENNEY											
FORMER EMPLOYMENT - BARTENDER, J W LOUNGE											
***** COMPANIES THAT REQUESTED YOUR CREDIT HISTORY *****											
01/28/98 EQUIFAX - DISCLOSURE											
12/01/97 PRM SPECIAL FINANCE											
09/05/97 PRM FIRST DEPOSIT/CG MAR											
07/16/97 AR 1618052644											
05/17/97 PRM FIRST DEPOSIT/CG MAR											
03/14/97 PRM CAPITAL ONE											
12/02/96 WEST CAPITAL FINANCI											
11/07/96 FK WEST CAPITAL FINANCI											
10/14/96 WEST CAPITAL FINANCI											
08/05/96 ERMS-NORTH AUGUSTA-4											
01/21/98 AFFIRMATIVE RESEARCH											
11/08/97 RECEIVABLE SPECIALIS											
07/22/97 AR ASSOCIATES FIN CREDI											
07/18/97 PRM FIRST DEPOSIT/CG MAR											
04/23/97 RECEIVABLE SPECIALIS											
03/01/97 PRM SPECIAL FINANCE											
11/14/96 FK WEST CAPITAL FINANCI											
11/01/96 FK COMMERCIAL FINANCI											
09/10/96 VFS, INC											
05/17/96 WEST CAPITAL FINANCI											

THV-RESTART 00000

COMPLETE PAGE 1 OF 1

Can't find info on 803408962

# for dispute

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank

1571-722-7220 maybe Nations Bank



Please address all future  
correspondence to

Equifax Credit Information Services  
P. O. Box 105518  
Atlanta, GA 30348  
1(800) 440-5059

## CREDIT FILE

### Personal Identification Information

May 8, 1998

Sharon K Downs  
6325 Shawnee Av  
Las Vegas, NV 89107

Social Security #:  
Date of Birth: May 5th, 1946

Previous Address(es):  
618 S B St, Lake Worth, FL 33460  
4415 Roark, Las Vegas, NV 89124

Formerly Known As: Sharon K Simon

Last Reported Employment: JC Penney  
Previous Employment(s): Bartender, J W Lounge

### Credit Account Information

Company Name	Account Number	Whose Acct	Date Opened	Months Reviewed	Date of Last Activity	High Credit	Terms	Items as of Date Reported			Date Reported
								Balance	Past Due	Status	
American Express CHARGED OFF ACCOUNT		I	09/89	4	09/91	\$3010		\$3010	\$3010	09	11/93
Banc One CHARGED OFF ACCOUNT ACCOUNT CLOSED BY CREDIT GRANTOR		I	11/87		10/91	\$2400		\$2871	\$2871	R9	08/97
Barnett N RGN Loan O AUTO		J	12/89	58	10/94	\$18215	303	\$0		I1	10/94
Burdines ACCOUNT CLOSED BY CREDIT GRANTOR CHARGE		U	09/87		03/98	\$0		\$0		R1	03/98
Capital One CREDIT CARD		I	01/98	1	03/98	\$100	10	\$65		R1	03/98
Chase Na Previous Payment History: 1 Time 60 days late; 3 Times 90+ days late Previous Status: 12/91 - R5; 11/91 - R5; 10/91 - R4 CHARGED OFF ACCOUNT CLOSED ACCOUNT		J	05/88		12/91	\$800	160	\$950	\$950	R9	07/92
Levitz/Cecap ACCOUNT TRANSFERRED OR SOLD		I	11/86		11/91	\$939		\$0		R	02/98
Lord & Taylor CHARGED OFF ACCOUNT		I	09/87		09/91	\$472		\$0		09	09/93

EXHIBIT 2  
(Continued on reverse)

Page 1 of 2



**Credit Account Information - Continued**

Company Name	Account Number	Whose Acct	Date Opened	Months Reviewed	Date of Last Activity	High Credit	Terms	Items as of Date Reported			Date Reported
								Balance	Past Due	Status	
Macy's California		J	10/84		03/96	\$238	239	\$238	\$238	I9	04/98
Previous Payment History: 2 Times 90 + days late											
Previous Status: 10/96 - I5; 09/96 - I5											
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Macy's California		J	10/84		03/96	\$854	239	\$239	\$239	R9	03/98
Previous Payment History: 1 Time 90 + days late											
Previous Status: 10/96 - R5											
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Macy's South		I	07/89		01/92	\$0	21	\$0	\$0	R9	03/98
CHARGED OFF ACCOUNT											
ACCOUNT CLOSED BY CREDIT GRANTOR											
Midland Mortgage		I	07/86	31	03/98	\$68920	681	\$59472		I1	03/98
REAL ESTATE MORTGAGE											
FHA MORTGAGE											

**Companies that Requested your Credit File**

05/08/98 Equifax - Update	04/21/98 Sprint
04/16/98 Equifax - Disclosure / ACIS 810617988	03/07/98 Equifax - Update
03/04/98 Equifax - Update	02/11/98 Equifax - Disclosure / ACIS 804206398
02/03/98 Equifax - Disclosure / ACIS 803408862	01/28/98 Equifax - Disclosure
01/21/98 Affirmative Research Unlimite	12/01/97 PRM-Creative Auto Finance
11/03/97 Receivable Specialist Inc	09/05/97 PRM-First Deposit/Cg Marketin
07/22/97 AR-Associates Fin Credit Card	07/16/97 AR-Associates Fin Credit Card
07/15/97 PRM-First Deposit/Cg Marketin	05/17/97 PRM-First Deposit/Cg Marketin
04/23/97 Receivable Specialist Inc	12/02/96 West Capital Financial Servic
11/14/96 FK-West Capital Financial Ser / WSTCPTFNCL	11/07/96 FK-West Capital Financial Ser / WSTCPTFNCL
11/01/96 FK-Commercial Financial / COMCL FINC	10/14/96 West Capital Financial Servic
09/10/96 VFS, Inc	08/05/96 ERM Atl Med-Nagars
05/17/96 West Capital Financial Servic	

- End of Credit File -

**(800) 405-0081**

DATE 01/26/00  
SOCIAL SECURITY NUMBER

## CREDIT HISTORY

EXHIBIT 3

SANDRA E. JACKSON, ESQ.  
Nevada Bar No. 7033  
EARLEY SAVAGE  
7251 West Lake Mead Blvd, Suite 550  
Las Vegas, Nevada 89128  
(702) 388-0113  
Attorneys for  
NCO FINANCIAL SYSTEMS, INC.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHARON KAY DOWNS,

Plaintiff,

v.

NCO FINANCIAL SYSTEMS, INC., a  
foreign corporation

Defendant.

CV-S- 00 - 0163 - PMP -RLH

**DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO: SHARON KAY DOWNS, Plaintiff; and

TO: MITCHELL D. GLINER, ESQ., Plaintiff's attorney.

Pursuant to Rules 26, 33 and 34 of the Federal Rules of Civil Procedure, Defendant NCO FINANCIAL SYSTEMS, INC., hereby responds to Plaintiff's FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS:

**INTERROGATORY NO. 1:** Please state the name, work and home addresses and telephone numbers, and position of the person responding hereto.

**RESPONSE TO INTERROGATORY NO. 1:** Steven Leckerman, Chief Operating Officer, c/o NCO Financial Systems, Inc., 515 Pennsylvania Avenue, Ft. Washington, (716) 691-5400.

**INTERROGATORY NO. 2:** State the name, current work and home addresses and telephone numbers, and position of each person consulted by you, and identify each document referred to by you in the preparation of your Answers to these Interrogatories.

**ANSWER TO INTERROGATORY NO. 2:** OBJECTION to the extent that this response

1 involves attorney client privilege or other protected matters. Without waiving such objection, the  
2 party identified in the preceding interrogatory has reviewed the collection file in this matter.

3 **INTERROGATORY NO. 3:** State your full name, your business purpose and your form of  
4 business organization (e.g. corporation, partnership, sole proprietorship, etc.) Your current net worth  
5 and your gross receipts for past three years.

6 **ANSWER TO INTERROGATORY NO. 3:** The defendant's name is NCO FINANCIAL  
7 SYSTEMS, INC., its form of business organization is a corporation, and it is a collection agency.  
8 OBJECTION as to request for past three years gross receipts as proprietary, overbroad, burdensome  
9 and irrelevant as past earnings cannot reasonably lead to relevant information on the issue of punitive  
10 damages, the only issue for which plaintiff can conceivably be seeking such information.  
11 OBJECTION as to request for net worth as such information is proprietary, overbroad, burdensome,  
12 irrelevant. Such request is, additionally, premature because entitlement to punitive damages is an  
13 issue of law and defendant anticipates filing a motion for summary judgment on this issue, the  
14 determination of which will likely preclude any entitlement to such information. In the event that  
15 disclosure of such information is required, defendant will be seeking a protective order prior thereto.

16 **INTERROGATORY NO. 4:** State whether there is any insurance agreement under which  
17 any person carrying on an insurance business may be liable to satisfy part or all of the judgment  
18 which may be entered in this action or to indemnify or reimburse for payments made to satisfy any  
19 judgment which may be entered in this action, and identify all documents reflecting the existence of  
20 such insurance agreement.

21 **ANSWER TO INTERROGATORY NO. 4:** Yes. Insurance declaration page.

22 **INTERROGATORY NO. 5:** Identify the persons or entities which are the creditor(s)  
23 regarding any debts which you have attempted to collection from Plaintiff, identify all documents  
24 related or relevant to your contractual agreement(s) or other business relationships with said person  
25 or entities, identify each person who has had any contact or communication on your behalf with said  
26 person or entities regarding Plaintiff or the debt underlying this action, state when, how, where, and  
27 with whom said contact or communication occurred and in detail and with particularity the substance  
28 thereof, and identify all documents relevant or related thereto.

**ANSWERTO INTERROGATORY NO. 5:** The debt originated at NationsBank, was sold as part of a portfolio. It was thereafter held by Global Rated Eligible Asset Trust and serviced by Commercial Financial Services, Inc. Upon institution of bankruptcy proceedings, In Re: Commercial Financial Services, Inc., Case No. 98-05162-R and CF/SPC NGU, Inc., Case No. 98-05166-R, the United States Bankruptcy Court, District of Oklahoma, approved NCO FINANCIAL SYSTEMS, INC., to collect certain accounts, including the subject debt. See attached Revocable Power of Attorney executed in furtherance thereof. Other documents relevant to the debt and the aforesaid proceedings may be found in the office of the Clerk of the Bankruptcy Court.

**INTERROGATORY NO. 6:** Identify all documents related or relevant to any purported debts owed by Plaintiff to you for the underlying creditor, and describe in detail and with particularity each event, payment, contact or communication relevant or related to the collection by you of said debts from Plaintiff.

**ANSWER TO INTERROGATORY NO. 6:** OBJECTION on the grounds that the interrogatory is vague, ambiguous, overbroad, and vexatious. Additionally, discovery is continuing. Without waving defendant's objection, see Power of Attorney, Fact Sheet and sample notification letter attached hereto which was mailed to plaintiff prior to December 3, 1999. See also, letter to plaintiff found as Exhibit 1 to the complaint, which was mailed to her on or about December 3, 1999. Upon receipt of plaintiff's notice of dispute, NCO ran a magnetic tape by which it requested deletion. No telephone calls were made to, or received from, plaintiff.

**INTERROGATORY NO. 7:** For each person who has had any involvement in any manner in any efforts on your behalf to collect or attempt to collect any debt purportedly owing by Plaintiff, state his/her name, any aliases used, position, home and work addresses and telephone numbers, and the nature and purpose of his/her involvement, describe each action taken, the nature, contents and subject matter of each discussion or conversation held, and the time, place and date of each such action or conversation; and identify all documents relevant, related to or reflecting said involvement of each such person.

**ANSWERTO INTERROGATORY NO. 7:** Company representatives include Carol Anton, correspondence clerk, and Steven Leckerman, Sr., Chief Operating Officer. They may be found at

March 1, 2000

CERTIFIED MAIL  
RETURN RECEIPT  
REQUESTED

EXPERIAN  
ATTENTION: NCAC  
P.O. Box 2104  
Allen Texas 75002

Re: SHARON KAY DOWNS/CREDIT DISPUTE

Dear Sir:

This letter is a dispute under FCRA § 1681i. I enclose page 2 of my Experian Report, dated February 17, 2000. I provide my required identifying information:

Name: Sharon Kay Downs  
Spouse's First Name: Richard M. Simon  
(former husband)  
Present Home Address: 6325 Shawnee Avenue  
Las Vegas, Nevada 89107  
Previous Addresses: 6325 Shawnee Avenue  
(for last 5 years Las Vegas, Nevada 89107  
including Zip Codes)  
Social Security Number: 530-32-5057  
Year of Birth: 1946

The debt which NCO Financial Systems is attempting to collect is approximately 10 years old. I neither had nor used a credit card from May, 1991 - January 19, 1998. NCO has procured a time-barred debt and is attempting to collect the same by providing false data concerning its date of origin.

Please delete this information. It has already been deleted from both my Equifax and Trans Union Credit Profiles.

Sincerely,

SHARON DOWNS

Enclosure

Information affecting your creditworthiness

Items listed with dashes before and after the number, for example --1--, may have a potentially negative effect on your future credit extension and are listed first on the report.

Credit grantors may carefully review the items listed below when they check your credit history. Please note that the account information connected with some public records, such as bankruptcy, also may appear with your credit accounts listed later in this report.

Credit information about you

Source/ Account number (except last few digits)	Date opened/ Reported since	Date of status/ Last reported	Type/ Terms/ Monthly payment	Responsibility	Credit limit or original amount/ High balance	Recent balance/ Recent payment	Comments
--1-- NCO FINANCIAL SYSTEMS IN 515 PENN AVE PHILADELPHIA PA 19144 ...8	6-1999/ 6-1995	6-1995/ 11-1999	installment/ NA/ \$0	Individual	\$3,160 / NA	\$4,315 as of 11-1999/	Status: collection account. \$4,315 past due as of 11-1999. Account history: Collection as of 11-1999, 6-1995 This account is scheduled to continue on record until 6-2002.

Original creditor: NCO/GREAT TRUST